

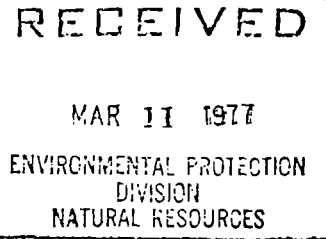
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58349
March 10, 1977

GE Rome
17.8
Date: _____
Other: _____

Mr. J. Leonard Ledbetter
Director
Environmental Protection Division
Department of Natural Resources
270 Washington Street, S. W.
Atlanta, Georgia 30334



Dear Mr. Ledbetter:

Thank you for the opportunity to review our comments on the Rome Plant NPDES Permit with Mr. Welsh and Mr. Jernigan and you. I believe that the meeting produced a worthwhile exchange of ideas and better understanding.

One of the subjects we discussed was whether the decision issued by the EPA on February 2, regarding effluent standards for PCBs under Section 307(a) of the FWPCA was applicable to the Rome Plant's permit or not. I indicated that we would share our understanding of that decision with you.

The decision and regulations issued under Section 307(a) apply only to manufacturers of PCBs and to plants that use PCBs in the manufacture of capacitors and transformers. As you know, the Rome Plant has never manufactured PCBs. Moreover, since the Rome Plant will cease the manufacture of transformers containing Pyranol by June 30, 1977, as publicly announced and, hopefully, even earlier, the regulation is simply not applicable to the Rome Plant nor to the plant's NPDES Permit.

Both the counsel for General Electric's Corporate Environmental Protection Operation in Schenectady, as well as our outside counsel in Atlanta have reviewed the decision and reached the conclusion that the regulations will not apply to the Rome Plant. Our counsel cite as firm evidence of their conclusion, the paragraph beginning at the bottom of page 6550 and continuing on page 6551 in 42 Federal Register No. 22, Wednesday, February 2, 1977.

Mr. J. Leonard Ledbetter - 2 - March 10, 1977

Thank you again for your courtesy in meeting with us last Monday. We look forward to working with you closely in the months ahead.

Sincerely,



Richard L. Reinhart
Manager
Transformer and Distribution
Equipment Relations and
Utilities Operation
General Electric Company

RLR:al

cc: Mr. G. B. Welsh
Mr. W. Jernigan
Mr. R. Byron Attridge

Include
in copy

STATE OF GEORGIA
DEPARTMENT OF NATURAL RESOURCES

OFFICE MEMORANDUM

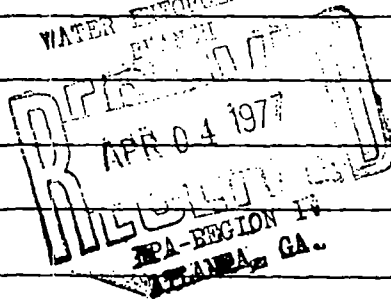
Date: 3/28/77 Time: _____
TO: George Harlow
Enf. Div. EPA
FROM: JBW

SUSPENSE DATE: _____

☒ For your information and/or file
☒ Attached per your request
____ Please handle
____ See or call me about this
____ Draft reply for signature of _____
____ For your approval/signature
____ Please furnish me with information
____ Review and return

COMMENTS: _____
Thought you might
be interested.

Gene



WATER ENFORCEMENT BRANCH
ROUTE SLIP

DATE _____

FROM: ~~Mr. Harlow~~

TO: _____ Patrick
_____ Ruch
_____ Lank
_____ Guinyard
_____ Moebes
_____ Kaplan
_____ Cloward
_____ Wallace
_____ Wooten
_____ Taimi
_____ Cozart
✓ _____ Jennings
_____ Wilson

SUSPENSE DATE _____

REMARKS:



Department of Natural Resources

ENVIRONMENTAL PROTECTION DIVISION

270 WASHINGTON STREET, S.W.
ATLANTA, GEORGIA 30334

George Harlow
Env. Division
E.P.A.